

MICHAEL J. STORTZ (State Bar No. 139386)

Michael.Stortz@dbi.com

BETH O. ARNESE (State Bar No. 241186)

Beth.Arnese@dbi.com

DRINKER BIDDLE & REATH LLP

50 Fremont Street, 20th Floor

San Francisco, California 94105-2235

Telephone: (415) 591-7500

Facsimile: (415) 591-7510

Attorneys for Defendant

AT&T MOBILITY LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

BRADBERRY,

Plaintiff,

v.

T-MOBILE, USA, INC. et al.

Defendants.

Case No. C 06-06567 CW

**STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE**

Bradberry v. mBlox, Inc

Case No. C 07-05298 CW

Pishvae v. Verisign, Inc.

Case No. C 07-03407 CW

Jiran v. AT&T Mobility, LLC, et al.

Case No. C 08-00013 CW

Valdez v. M-Qube, Inc., et al.

Case No. C 07-06496 CW

1 The Parties in this action hereby stipulate and agree to the entry of an Order
2 Continuing for thirty days the Case Management Conference presently set for June 17,
3 2008 at 2:00 p.m. and in support of the requested relief state:

4 1. The Parties in the above-captioned matters previously stipulated to continue
5 the Case Management Conference for all cases until June 17, 2008.

6 2. On May 12-13, 2008, and again on May 22-24, 2008, Counsel for Plaintiffs
7 Jiran and Gresham held in-person mediation sessions with Counsel for Defendant AT&T
8 Mobility, which were also attended by Counsel for certain Defendants in these related
9 suits. As a result of the mediation, a global settlement agreement was reached.

10 3. On May 30, 2008, the Hon. Alice Bonner presiding in the case styled
11 *Tracie McFerren v. AT&T Mobility, LLC*, Fulton County Superior Court Case No. 08-
12 CV-151322, preliminarily approved the settlement reached between the class and
13 Defendant AT&T Mobility. If finally approved and implemented, this settlement will
14 resolve the claims of both Plaintiffs and the proposed class against Defendant AT&T
15 Mobility in this case and some claims against certain other Defendants in the above-listed
16 related cases. [See Order Granting Preliminary Approval of Class Action Settlement, a
17 true and accurate copy of which is attached as Exhibit A].

18 4. Under the circumstances, the Parties request an additional thirty days to
19 assess the impact of the settlement in *McFerren v. AT&T Mobility*.

20 WHEREFORE, the Parties respectfully request this Court enter an Order
21 Continuing the Case Management Conference presently set for June 17, 2008 at 2:00 pm
22 until July 22, 2008 at 2:00 p.m., or such other date as is convenient to the Court, where if
23 these matter are not resolved the Parties will discuss a proposed schedule for a responsive
24 pleadings deadline.

25 IT IS SO STIPULATED.
26
27
28

1 Dated: June 12, 2008

DRINKER BIDDLE & REATH LLP

2 /s/ Michael J. Stortz
3 MICHAEL J. STORTZ

4 Attorneys for Defendant
5 AT&T Mobility, LLC

6 50 Fremont Street, 20th Floor
7 San Francisco, CA 94105

8 *Of Counsel*
9 Seamus C. Duffy
10 DRINKER BIDDLE & REATH LLP
11 One Logan Square
12 18th & Cherry Streets
13 Philadelphia, Pennsylvania 19103-6996
14 Telephone: (215) 988-2700

12 Dated: June 12, 2008

ARNOLD & PORTER LLP

13 /s/ Angel L. Tang
14 RONALD L. JOHNSTON
15 ANGEL L. TANG

16 Attorneys for Defendants
17 VeriSign, Inc. and m-Qube, Inc.

18 777 South Figueroa Street, Suite 4400
19 Los Angeles, California 90017
20 (213) 243-4000

21 *Of Counsel*
22 James Cooper
23 Arnold & Porter LLP
24 555 Twelfth Street, NW
25 Washington, DC 20004-1206
26 Telephone: (202) 942-5014

1 Dated: June 12, 2008

LUCE FORWARD HAMILTON & SCRIPPS LLP

2
3 /s/ Jeffrey L. Fillerup
JEFFREY L. FILLERUP

4 Attorneys for Defendant
mBlox, Inc.

5
6 Rincon Center II
121 Spear Street, Suite 200
San Francisco, CA 94105-1582
7 Telephone: (415) 356-4600
8 Facsimile: (415) 356-4610

9 *Of Counsel*

Craig M. White

10 Brent Austin

Chung-Han Lee

11 WILDMAN HARROLD ALLEN & DIXON LLP

12 225 West Wacker Drive

28th Floor

13 Chicago, IL 60606-1229

14 Telephone: (312) 201-2000

15 Dated: June 12, 2008

SHEPPARD MULLIN RICHTER & HAMPTON LLP

16
17 /s/ Philip Atkins-Pattenson
PHILIP ATKINS-PATTENSON

18 Attorneys for Defendant
19 Mobile Messenger Americas, Inc.

20 Four Embarcadero Center
Seventeenth Floor
21 San Francisco, CA 94111
Telephone: (415) 434-9100
22 Facsimile: (415) 434-3947

1 Dated: June 12, 2008

KAMBEREDELSON, LLC

2
3 /s/ Myles McGuire
MYLES MCGUIRE

4 Attorneys for Plaintiffs
5 Louis Jiran, Dolores Gresham and Aliza Valdez

6 Terry M. Gordon
7 The Law Offices of Terry M. Gordon
8 Three Harbor Drive, Suite 215
9 Sausalito, California 94965
Telephone: (415) 331-3601
Facsimile: (415) 331-1225

10 *Of Counsel*
11 Jay Edelson
12 Myles McGuire
13 KamberEdelson, LLC
53 West Jackson Blvd.
Suite 1530
Chicago, IL 60604

14 John G. Jacobs
15 Bryan G. Kolton
16 The Jacobs Law Firm, CHTD.
17 122 South Michigan Ave
Suite 1850
Chicago, IL 60603

18 Dated: June 12, 2008

AUDET & PARTNERS, LLP

19
20 /s/ William M. Audet
WILLIAM M. AUDET

21 Attorney for Plaintiff Babak Pishvaei

22
23 William M. Audet
24 AUDET & PARTNERS LLP
25 221 Main Street, Suite 1460
26 San Francisco, California 94105
27 Telephone: (415) 568-2555
28

1 Dated: June 12, 2008

BROAD & CASSEL

2
3 /s/ Jeffrey R. Geldens
JEFFREY R. GELDENS

4 Attorneys for Defendant
5 Buongiorno USA, Inc.

6 Jeffrey R. Geldens
7 BROAD AND CASSEL
8 One Biscayne Tower
2 South Biscayne Boulevard, 21st Floor
Miami, FL 33131
Telephone: (305) 373-9400

10 Dated: June 12, 2008

GORDON & REES, LLP

11
12 /s/ Aristotle E. Evia
ARISTOTLE E. EVIA

13 Attorneys for Defendant
14 Buongiorno USA, Inc.

15 Aristotle Eder Evia
16 GORDON & REES, LLP
275 Battery Street, 20th Floor
San Francisco, CA 94111
Telephone: (415) 986-5900

18 Dated: June 12, 2008

ARENT FOX LLP

19
20 /s/ Debra J. Albin-Riley
DEBRA J. ALBIN-RILEY

21 Attorney for Defendant T-Mobile USA, Inc.

22
23 Debra J. Albin- Riley
ARENT FOX LLP
24 555 West Fifth Street, 48th Floor
Los Angeles, CA 90013
25 Telephone: (213) 629-7400
Facsimile: (213) 629-7401

1 Dated: June 12, 2008

THE JACOBS LAW FIRM, CHTD

2 /s/ John G. Jacobs

3 JOHN G. JACOBS

4 Attorneys for Plaintiff
5 Russell Bradberry

6 John G. Jacobs
7 Bryan G. Kolton
8 THE JACOBS LAW FIRM, CHTD
9 122 South Michigan Ave., Ste. 1850
10 Chicago, Ill 60603
11 Telephone: (312) 427-4000
12 Facsimile: (312) 427-1850
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

MICHAEL J. STORTZ (State Bar No. 139386)

Michael.Stortz@dbr.com

BETH O. ARNESE (State Bar No. 241186)

Beth.Arnese@dbr.com

DRINKER BIDDLE & REATH LLP

50 Fremont Street, 20th Floor

San Francisco, California 94105-2235

Telephone: (415) 591-7500

Facsimile: (415) 591-7510

Attorneys for Defendant

AT&T MOBILITY LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

BRADBERRY,

Plaintiff,

v.

T-MOBILE, USA, INC. et al.

Defendants.

Case No. C 06-06567 CW

[PROPOSED] ORDER

Bradberry v. mBlox, Inc

Case No. C 07-05298 CW

Pishvae v. Verisign, Inc.

Case No. C 07-03407 CW

Jiran v. AT&T Mobility, LLC, et al.

Case No. C 08-00013 CW

Valdez v. M-Qube, Inc., et al.

Case No. C 07-06496 CW

1 Based on the stipulation of the Parties and for good cause shown, IT IS HEREBY
2 ORDERED.

3 1. The Case Management Conference presently set for June 17, 2008 at 2:00
4 pm shall be continued to July 22, 2008 at 2:00 p.m.. If the Parties have not previously
5 resolved the proposed schedule for a responsive pleading deadline by that time, the
6 Parties will discuss a proposed schedule for a responsive pleadings deadline.

7 Pursuant to stipulation and for good cause shown, IT IS SO ORDERED.

8
9 Dated: June __, 2008

10
11

The Honorable Claudia Wilken
12 United States District Court,
13 Northern District of California
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28